

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast  
Service )

To: The Commission

Comments  
of the  
**New York Metropolitan Advisory Committee**  
to the Ex Parte Submission  
of the  
Association for Maximum Service Television, Inc. and Other Broadcasters  
Based on New Technical Discoveries  
to Help the Commission Improve  
the DTV Table of Allotments/Assignments

---

**The New York Metropolitan Advisory Committee:**

New York City Police Department  
New York City Fire Department  
New York City Department of Correction  
New York City Department of Parks and Recreation  
New York City Department of Information Technology and Telecommunications  
New York City Department of Transportation  
New York City Transit Authority  
City of Yonkers, New York, Fire Department  
City of New Rochelle, New York, Police Department  
Nassau County, New York, Police Department  
Suffolk County, New York, Police Department (Representing Suffolk County)  
Elmont, New York, Fire District  
Bergen County, New Jersey, Police Department

045

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast  
Service )

1

## **COMMENTS**

### **Effects on Incumbent 470-512 MHz Public Safety Users**

The Committee has filed comments and reply comments to the Commission on the Second and Sixth Further Notices of Proposed Rulemaking specifically citing the effects of the proposed allocation of digital television channels 16 in New Haven, CT and 15 in Providence RI<sup>1</sup>. The Committee's comments illustrated harmful interference due to these assignments which were supported with detailed engineering analyses.

In its Sixth Report and Order released April 21, 1997, the Commission's table of Digital Television channel allocations, with modifications, posed no threat to the public safety communications systems of the Committee's constituency in the New York City metropolitan area.

Upon review of the Ex Parte Submission of the Association of Maximum Service Television (AMSTV) and its Exhibit 1A, Improvements to the DTV Table, there poses a similar threat, as stated above, to the Committee's Public Safety Communications systems. Digital Television channel 16 has been proposed in New Haven, CT by AMSTV's table of allocations.

---

<sup>1</sup> Comments of the New York Metropolitan Advisory Committee, November 21, 1996

Referencing the Committee's comments of November 21, 1996 to the Commission, severe degradation and harmful interference to the communications systems of public safety entities operating in the 476-482 MHz band (TV Channel 15) would occur especially to fixed sites used as transceivers/remote receivers. The Committee has aggressively detailed this position in its November 21, 1996 comments and advises the Commission to recall the negative impact of this proposal to the public safety community in the New York City metropolitan region.

#### Effects on Future Public Safety Use of 746-806 MHz

The Second Notice of Proposed Rulemaking of WT Docket 96-86, proposes the use of television channels 63, 64, 68, 69 for public safety.

The Committee has reviewed the relevant assignments in the Commission's table of allocations of the Sixth Report and Order and has determined that there are no new channel assignments that would potentially stop public safety from utilizing the proposed channels in the New York City region.

AMSTV asserts that its additional use and allocation of television channels 60 through 69 in its modified table of allocations would not impact use of these frequencies by public safety. The AMSTV proposed improvements for the same New York City region,

however, has three relevant assignments which would essentially block public safety from using the proposed spectrum.<sup>2</sup>

### CONCLUSION

The Committee urges the Commission to not consider the AMSTV table of allocations for a number of reasons:

- the allocation of digital television channel 16 in New Haven, CT poses a harmful interference potential to incumbent public safety entities using radio systems on the 476-482 MHz within the New York City Metropolitan area.
- the modification to the tables with respect to spectrum in the 746-806 MHz (TV Channels 60-69) would potentially prevent public safety's use of that spectrum in the New York City Metropolitan area.
- any change to the Commission's Sixth Report and Order would require a formal Notice of Proposed Rulemaking.

Respectfully submitted,



Vincent R. Stile  
Committee Chairman  
New York Metropolitan Advisory Committee  
December 16, 1997

---

<sup>2</sup> NJ: Newark existing channel 13 with DTV channel 64; CT: Hartford existing channel 18 with DTV channel 68, Hartford existing channel 24 with DTV channel 63.